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Memorandum

To: Distribution Center Associates
CC: Trevor McLinn, Steve Mays, Debbie Swartz, Mary Fox, Scott Johnson
From: Chris Zimmerman, Frank Napoli
Date: June 29, 2007
Subject: **UPDATE: OMP Distribution Center Procedures**

In an effort to improve AmerisourceBergen's (ABC) ability to monitor suspicious orders, ABC is implementing a new Controlled Substance/Listed Chemical Order Monitoring Program (OMP). This new program is designed to minimize the amount of manual maintenance required and will provide ABC with more clearly defined parameters as to the definition and identification of a suspicious order. This new program will also allow ABC to review, release, or cancel potentially suspicious orders before they are shipped to customers. This will result in greater control by the Distribution Centers (DCs) and ABC corporate over the quantity of product that customers are authorized to order. OMP supplements due diligence performed to open a new account and ABC's obligation to "know your customer." Also, associates must still report unusual factors that raise suspicions—even if an order is below OMP thresholds.

OMP will classify each customer based on specific criteria. Customers will be grouped by their DEA classification, such as Hospital/Clinic, Retail, Practitioner, Distributor, etc. Within these classifications, ABC will then classify an account as either Small, Medium or Large based on its monthly sales volume. A pre-determined threshold will be set for each classification of customer for each of the selected drugs in a Generic Code Number (GCN), such as Hydrocodone, Benzodiazepine or Phentermine.

OMP will use customer criteria to monitor sales of families of drugs on a monthly basis. When a customer order of a GCN item exceeds the established threshold, the order for that item will go into OMP Review. Once an order is in OMP Review, the DC will have the opportunity to review the order and take appropriate action.

The OMP Review process is a new DC requirement that must be conducted daily/nightly. During the review process, the DC will either release the order to be picked and shipped, cancel the order, or flag the order to be reviewed by Corporate Security and Regulatory Affairs (CSRA).

If an order is released or cancelled, the DC must enter a code and/or free form text to indicate why the action is being taken (see pp. 4-5). The system will log the user ID, date and time of any action taken. Any order not released or cancelled will be electronically submitted to CSRA to review the following business day (and CSRA may cancel or release it, or hold it for further investigation). Orders that are investigated by CSRA will be reported to the Drug Enforcement Administration (DEA). CSRA will also review released and cancelled orders to confirm they are being handled consistently and appropriately. All subsequent orders that continue to exceed the monthly threshold will be rejected from processing until the OMP held item is released. The reason for this rejection will be relayed to the customer as a "Not Serviced" message on the customer invoice.

All customer thresholds and criteria can be modified and are subject to change by CSRA at any time.

OMP SCREEN SHOTS AND INSTRUCTIONS

Identified below are sample screen shots and instructions for the DC to follow during the OMP review process.

This screen can be accessed from menu option B25D#18 or C17M#10. This will allow access to the OMP HOLD REVIEW / RELEASE screen. This screen will display all orders on OMP Hold in ascending customer number, order date, and OMP family Item Code sequence. The user will enter "S" to select a customer order for review.

B250041RG-S01	AmerisourceBergen	6/21/07
ZI17090	OMP Hold Review / Release	20:15:55
CF 06/11/07		Div: 040
Reposition to Customer: 000-000000		Display Only Status:
		OMP OMP
S Customer Ship-To Name	Ord Date	DEA# Fam Lines Stat
020-000984 FIRST CHOICE/SMITH'S #424	2007-06-18	BS6629678 A1 1
020-000984 FIRST CHOICE/SMITH'S #424	2007-06-18	BS6629678 C1 1
020-024117 GOOT'S #1 UNITED #877	!	2007-06-18 BG5758137 A1 1
020-024117 GOOT'S #1 UNITED #877	!	2007-06-18 BG5758137 D1 2
020-024117 GOOT'S #1 UNITED #877	!	2007-06-18 BG5758137 E1 1
020-024141 GOOT'S PHARMERICA-PCA	2007-06-18	BG5758113 A1 1
020-024141 GOOT'S PHARMERICA-PCA	2007-06-18	BG5758113 C1 2
020-024141 GOOT'S PHARMERICA-PCA	2007-06-18	BG5758113 D1 1
020-029512 *SUNsites CLINIC DRUG	2007-06-18	BU1394939 C1 1
020-029587 FEDERAL PRISON CAMP EL PASO	2007-06-18	BF2210691 D1 2
020-030684 VA MEDICAL CENTER (OUTPT PHY)	2007-06-18	AG3307724 C1 2
020-030684 VA MEDICAL CENTER (OUTPT PHY)	2007-06-18	AG3307724 D1 1
020-030742 CARL T HAYDEN VA MED CTR (OP)	2007-06-18	AC4260701 C1 1
020-030742 CARL T HAYDEN VA MED CTR (OP)	2007-06-18	AC4260701 D1 1
		More...
F3-Exit, F4-Cust Inquiry, F5-Refresh		S-Select for Detail Display
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The "Reposition to Customer" field will give you the ability to position the screen on a particular customer. If you are unsure of the customer number you can place the cursor in the field and press F4 for customer inquiry. This will allow the

user to search for a customer and return the customer number back to the OMP Review / Release screen. The Customer Inquiry screen is displayed below:

B70025-S001	AmerisourceBergen	Division 012	6/06/07
DOP2401	CUSTOMER INQUIRY/SELECTION		09:53:35
THU Run: 2			6/07/07
<hr/>			
Customer# Name.....		DEA#.....	
			Phone Number RTE STP
<hr/>			
012-001024 *	GNP ZONE PRICING 1-2		M58 NOW
012-001032 *	GNP ZONE PRICING 3-4		M59 NOW
012-001255 *	LONGSD		M60 NOW
012-000802 *	MSI RETURN GOODS CAGE	RA0289050	M61 NOW
012-001297 *	UNITED DRUG CP FILE		M62 NOW
012-001701 *	VONS #01 CP FILE		M63 NOW
012-001651 *	VONS #02 CP FILE		M64 NOW
012-001305 *	VONS #03 CP FILE		M65 NOW
012-001404 *	VONS #05 CP FILE		M66 NOW
012-001453 *	VONS #06 CP FILE		M67 NOW
012-001503 *	VONS #07 CP FILE		M68 NOW
012-001552 *	VONS #08 CP FILE		M69 NOW
012-001800 *	VONS APS CP FILE		M70 NOW
012-082412 *	ABBOTT PHARMACEUTICALS		M71 NOW
024-012112 *	ABBOTT PHARMACUETICALS	1 559 442 6555	M72 NOW
<hr/>			
- COPYRIGHT 2004, AMERISOURCEBERGEN CORPORATION			
F1=HELP, F3=EOJ, F7=View Salesman, F10=View, F12=Exit, ENTER, ROLL, "S"elect			

When a customer is selected from the OMP Review / Release screen the corresponding order detail will be displayed.

1. Customer number and customer ship-to name.
2. Customer DEA number.
3. Customer DEA type description: Hospital/Clinic, Retail, Distributor, Practitioner, etc.
4. Customer DEA size code: (S)mall, (M)edium, (L)arge
5. OMP item family and class code.
6. Alloc: Allocated monthly quantity to date
7. Revw: Quantity on OMP Review
8. Max: Customer monthly threshold for item
9. Ovr%: Percent ordered quantity exceeds threshold

B250042RG-S02	AmerisourceBergen	6/21/07
ZI17090	OMP Hold/Review/Release	20:19:03
CF 06/11/07		Div: 040
<hr/>		
Alloc: 12000		
Cust: 020-053173 DEMING HOSP.CORP/DBA MIMBRES	DEA# BD4954005	Revw.: 917235
DEA Cust Type....:	Cust Size: L	Max...: 5000
OMP Item Family.: TEST DESCRIPTION OF FULL VALUE	Family CD: Z1	Ovr%: 18484.70
Initial OMP Failure: Exceeded The OMP Customer/Item Family Threshold		
<hr/>		
S Qty Item# Description	Reason	Units
6 275+297 ALPRAZOLAM 0.25MG TAB 500	400105 MYL	3000
7 262-527 MORPH SUL 20MG/ML SOL 120ML	088603 EHX	840
99 001+248 HYDROCOD/GUA 5/100 MG EXP 16OZ	01594 TEV	
99 001+293 HYDROCOD/APAP 10/660 MG TAB 100	0567 WSN	9900
99 001r776 M-CLEAR SYR 16OZ	071016 RAC	47520
99 002-093 DURATUSS HD ELX 16OZ	040016 VRM	47520
99 004r251 CODICLEAR DH SYR 118ML	013404 VRM	11880
99 006+098 BUTALB/ASA/CF 50/325/40 CAP 100	1439 URL	9900
99 006+421 FIORICET/COD 30MG CAP 100	095801 WAT	9900
99 006+440 FIORINAL/COD 30MG CAP 100	095601 WAT	9900
99 006-580 M-CLEAR SYR 473ML	071516 RAC	47520
99 006+924 NUCOFED CHERRY EXP 16OZ	001616 MNR	47520 +
F3=Exit, F11=Drop, F12=Previous, F21=Update All		
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In this screen the user can select an item to be released or cancelled by selecting an item and pressing F10. To select all items press F21.

Once an item has been selected and accepted the OMP HOLD REVIEW / RELEASE – UPDATE screen will appear. Here the user must enter an action code and free form text. Key action code and press ENTER.

The codes should be used in the following situations:

AD = Approved By Div - Allocate

- This code should be used by the DC associate during the initial review. If the DC associate determines that the order quantity is not suspicious (based on the "know your customer" philosophy) the order can be released. "Know your customer" means knowing which accounts are hospitals, DoD accounts, the warehouse for a chain or grocery customer, or another large customer that has a known legitimate and well-established need for high volumes of controlled drugs and listed chemicals.
- You will receive information on an ongoing basis from CSRA that will help you make appropriate determinations. When in doubt, do not release an order so that CSRA can review it. "Know your customer" begins when a new account is opened, which under new procedures cannot happen until CSRA reviews detailed information about the account.
- Approval of a non-suspicious order is appropriate in an emergency – although a confirming phone call or other action may be appropriate (or information may originate with a customer calling ABC with the reason for an unusual order).
- Unless there are unusual factors, approval may be appropriate for DoD accounts, hospitals, Medco, PMSI, PharMerica, Kindred, Kaiser, warehouse for a chain or grocery customer, central fill pharmacies and other large, well-known accounts, particularly if an order takes a customer just over its threshold at the end of a month. Remember: Report unusual factors that raise suspicions.
- Such exceptions should be rare for retail and alt care pharmacies, particularly after thresholds are adjusted to reflect individual customer buying patterns.
- When in doubt, orders should be held for CSRA review.
- ***Any Dept. of Defense (DOD) order that is in OMP Review and approved to be released will have to be cancelled and re-entered with a new call number if you have already run invoices for the night.***

CD = Cancelled By Div

- This code should be used by the DC associate during the initial review if you determine that the order is not suspicious but should be cancelled because, for example, the order quantity is obviously not correct based on prior purchases. See discussion (above) about "know your customer" philosophy.

After you enter the code, you should document the action you are taking by entering a comment in the "Comment" field. The reason why you are taking the action or the name of the associate who instructed you to take the action should be entered in this field.

B250042RG-S02	AmerisourceBergen	6/21/07
ZI17090	OMP Hold/Review/Release	20:19:03
CF 06/11/07		Div: 040
		Alloc: 12000
Cust: 020-053173 DEMING HOSP.CORP/DBA MIMBRES	DEA# BD4954005 Revw.:	917235
DEA Cust Type....:	Cust Size: L Max.:	5000
OMP Item Family.: TEST DESCRIPTION OF FULL VALUE Family	CD: Z1 Ovr%:	18484.70
Initial OMP Failure: Exceeded The OMP Customer/Item Family Threshold		
.....		
: Qty Item# Description	Reason	Units :
: 99 001+293 HYDROCOD/APAP 10/660 MG TAB 100 0567 WSN		9900 :
:		:
: Enter the Review Action Code and Optional Comment		:
: AC = Approved By CSRA - Allocate	CC = Cancelled By CSRA	:
: AD = Approved By Div - Allocate	CD = Cancelled By Div	:
:		:
: Code(?) :		:
: Comment:		:
:		:
:		:
:		:
: F12=Previous		:
.....		:

The "F21- Update All" will allow you to enter a code for all of the records on the screen. Here the user must enter an action code and free form text. Key action code and press ENTER.

There is an additional action code on this screen for you to use to flag the order to be investigated by the CSRA Department.

IN = Investigate - Transmit to CSRA

- This code should be used after the initial review by the DC associate to identify that orders lines should be investigated by CSRA. These order lines will be transmitted to CSRA during the Star End of Day (EOD) process and will be marked "CSRA" to indicate they have been sent.

The following codes are used by CSRA in the following situations:

AC = Approved By CSRA – Allocate

- This code should be used when you receive notification back from CSRA that an order was investigated and approved to release.
- ***Any Dept. of Defense (DOD) order that is in OMP Review and approved to be released will have to be cancelled and re-entered with a new call number.***

CC = Cancelled By CSRA

- This code should be used when you receive notification back from CSRA that an order was investigated and should be cancelled.

Once an action code has been entered and ENTER has been pressed a confirmation screen will appear. Press F21 to confirm action.

B250031-S002 AmerisourceBergen 09:17:52
6/06/07 OMP HOLD REVIEW / RELEASE - [REDACTED] Units
Sales: 123456789
Cust: 012-000547 TEPLLOW DRUGS DEA# PM0120674 Held.: 123456789
DEA Customer type: 123456789012345678901234567890 Cust size: M Max..: 123456789
OMP Item Family...: 123456789012345678901234567890 Family CD: C1 Over.: 9999.99%

Update all of the OMP held records for this customer and OMP item family
Code with the review action code and optional comment below.

CODE(?) : AP Approve Order - Release to allocate

Comment: 12345678901234567890123456789012345678901234567890
12345678901234567890123456789012345678901234567890
12345678901234567890123456789012345678901234567890
12345678901234567890123456789012345678901234567890

[REDACTED]

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Enter F4=(?) Search F12=Previous F21=Apply code and comment to all records

Screen B25A #6 will display the total number of lines a customer currently has on OMP Review.

B25081-S002	AmerisourceBergen	23:32:30
6/26/07	CUSTOMER ORDER STATUS INQUIRY	
	ORDER HELD DISPLAY	
Customer # Customer Ship-to-Name Process Date/Time Series1 Date/Time		
049-122259	AMERISOURCEBERGEN -ECH	06/26/07 23.27.32 Multi-Header Ord.
Member Info: DONE	B232732CSO	06/27/07 23.27.48
Total Lines/Order:	Origin: Cust Service Order	Retn:
Number of Lines Filled/Held For:		
OMP Review.....: 13 (Total Number of Lines in OMP Review)		
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F1=HELP	F3=Exit	F10=Display Detail F12=Previous Screen

If two users try to access the same item in OMP Review the screen below will be displayed:

B250043RG-S001	AmerisourceBergen	6/21/07
ZI17090	OMP Hold Review / Release	20:21:22
CF 06/11/07	WARNING	Div: 040
Alloc: 12000		
Cust: 020053173 DEMING HOSP.CORP/DBA MIMBRES	DEA# BD4954005 Revw.:	917235
DEA Customer-Type:	Cust Size	L Max...: 5000
OMP Item Family...: TEST DESCRIPTION OF FULL VALU Family Cd Z1 Ovr%:	18484.70	
Intial OMP Failure: Exceeded The OMP Customer/Item Family Threshold		
The current status of this record is IN USE and is not available.		
The record was last updated by user ZI17090 at 20:19:02 on 07/06/21		
These records are currently under OMP review by the user shown above.		
F12=Previous		
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AVAILABLE CUSTOMER OMP STATUS REPORTS

The four following reports can be generated using OMPQRYCL (Call OMPQRYCL) from STAR Command Line.

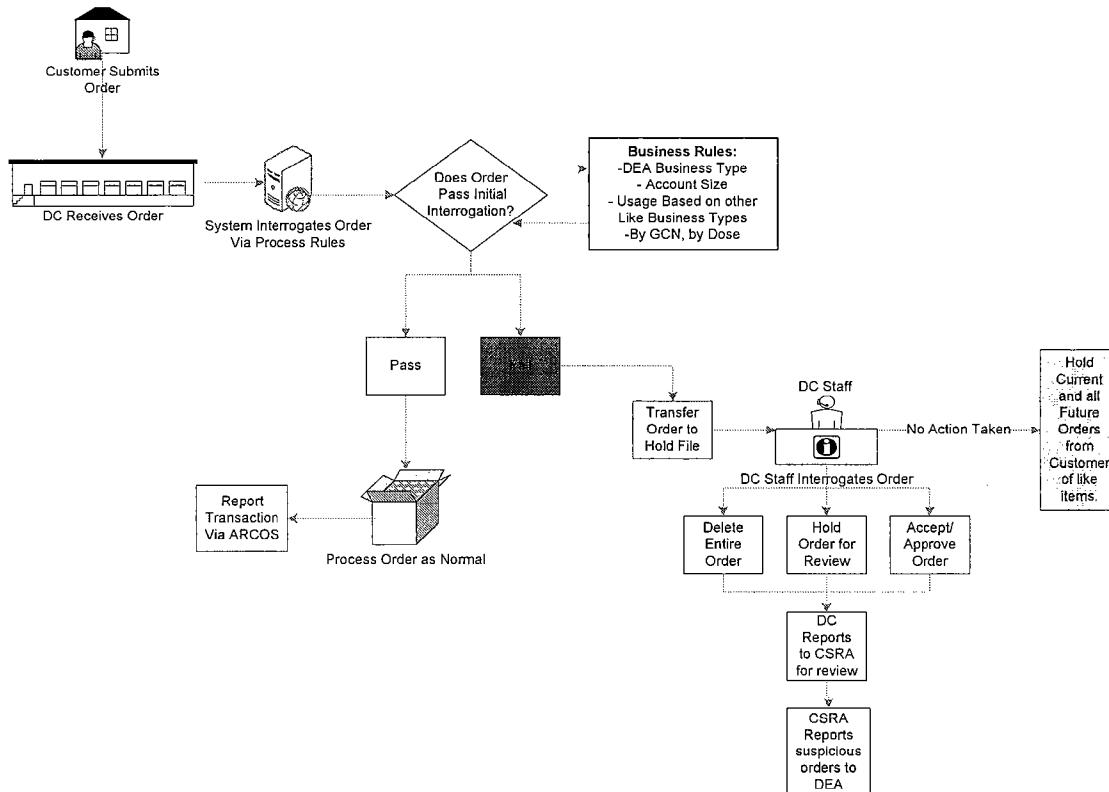
- 1) OMP activity report by Customer.
- 2) OMP activity report by OMP item family.
- 3) OMP Customers that have exceeded an OMP item family threshold.
- 4) OMP Customers that are between 90% and 100% of an OMP item family threshold.

PHASE 1 vs. PHASE 2	
PHASE 1	PHASE 2
Reserved orders can not be used in CSO. Customer will receive message indicating such.	Reserved orders can be used in CSO.
If a customer is set-up to always Alt Serv for a particular item, the accumulated monthly quantity will build separately in both DC's.	The accumulated monthly quantity will only build in the home DC.
Query OMPQRYCL will provide activity reporting based on customer and based on OMP item family, including customers approaching or exceeding thresholds.	A daily "Activity Report" will print each day in the DC to list all orders that are on review, cancelled, or released in OMP. A copy of this report will also be sent to CSRA. (Implementation will be shortly after Phase 2.)

MISCELLANEOUS

- All new customers are set-up to default to "small".
- The Item Family threshold accumulation by customer is not decremented when a credit is processed. It will be decremented when a fail to pick or order edit is done.
- COE customers will see a new message for item family. If they perform a soft allocation they will get a message that says "dispatch to allocate."

Order Monitoring Process (OMP)



DEA Notification Process

